

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**IN RE: WHIRLPOOL FRONT-  
LOADING WASHER PRODUCTS  
LIABILITY LITIGATION**

: Case No. 1:08-wp-65000  
: MDL No. 2001  
: Class Action  
:  
: Judge: James S. Gwin  
**MOTION FOR PROTECTIVE  
ORDER OF THE PROCTER &  
GAMBLE COMPANY**

Pursuant to Ohio Revised Code 1333.65 and Rule 26(c) of the Federal Rules of Civil Procedure, The Procter & Gamble Company ("P&G"), a nonparty to this action, moves this Court to enter a protective order to preserve the confidentiality of P&G's trade secrets and other confidential or proprietary business information, which the parties may attempt to introduce in these proceedings. Specifically, P&G requests that the Court hold an in camera hearing when evidence or testimony is presented, as identified in the Affidavit of Noelle Fitzgerald, which threatens the disclosure P&G's trade secrets and/or confidential or proprietary business information. Participation in the in camera hearing would be limited to essential courtroom personnel and counsel for the parties and P&G. This Motion is supported by the accompanying Memorandum in Support and the Affidavits of Amanda P. Lenhart, Esq. and Noelle Fitzgerald.

Respectfully submitted,

/s/ Amanda P. Lenhart

Amanda P. Lenhart (0072517)

DINSMORE & SHOHL LLP

1900 Chemed Center

255 East Fifth Street

Cincinnati, OH 45202

Phone: 513-977-8200

Facsimile: 513-977-8141

Email: [amanda.lenhart@dinslaw.com](mailto:amanda.lenhart@dinslaw.com)

Attorney for Non-Party

The Procter & Gamble Company

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been duly served upon all counsel of record by the Court's CM/ECF Electronic Filing System this 26th day of May 2010.

/s/ Amanda P. Lenhart